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*Attorneys for the Foreign Representative*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

INTEGRADORA DE SERVICIOS  
PETROLEROS ORO NEGRO, S.A.P.I. DE  
C.V.

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 18-11095

In re:

PERFORADORA ORO NEGRO, S. DE R.L.  
DE C.V.

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 18-11094

**MOTION OF FOREIGN REPRESENTATIVE ALONSO DEL VAL-ECHEVERRIA  
PURSUANT TO 11 U.S.C. §§ 1519 AND 1521 AND FEDERAL RULE OF BANKRUPTCY  
PROCEDURE 1015(b) FOR ORDER DIRECTING JOINT ADMINISTRATION OF  
CASES UNDER CHAPTER 15 OF BANKRUPTCY CODE**

Alonso Del Val-Echeverria (“Del Val” or “Petitioner”), in his capacity as Foreign Representative (the “Foreign Representative”) of both Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V. (“Integradora Oro Negro”) and Perforadora Oro Negro, S. de R.L. de C.V. (“Perforadora Oro Negro” and, together with Integradora Oro Negro, the “Debtors”) pending before the Second District Court for Civil Matters of México City (the “Concurso Mercantil”), through his attorneys Quinn Emanuel Urquhart & Sullivan, LLP, respectfully submits this motion (the “Motion”) for entry of an order (the “Proposed Order”), substantially in the form attached hereto as Exhibit A, authorizing the joint administration of the above-captioned Chapter 15 cases pursuant to sections 1519 and 1521 of title 11 of the United States Code (as amended, the “Bankruptcy Code”) and Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). In support of the Motion, the Foreign Representative respectfully represents as follows:

**JURISDICTION**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(a) and 1334(a) and (b) and 11 U.S.C. § 1501. Venue is proper in this district pursuant to 28 U.S.C. §§ 1410(a)(1) and (3). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P).

**BACKGROUND**

2. On or about April 20, 2018, the Petitioner, in his capacity as Foreign Representative of the Debtors, petitioned this Court for entry of an Order pursuant to sections 1515 and 1517 of the Bankruptcy Code recognizing the *Concurso Mercantil* as a foreign main proceeding, or in the alternative a foreign nonmain proceeding. Additionally, the Foreign Representative filed a separate Verified Petition for Recognition on behalf of each of the Debtors setting forth in full the basis for

these Chapter 15 cases, as well as the documents required pursuant to section 1515 of the Bankruptcy Code. Additional background concerning the Debtors' Chapter 15 cases is set forth in the Declarations of Alonso Del Val-Echeverria and Alfonso López Melih, filed contemporaneously herewith.

**RELIEF REQUESTED**

3. By this Motion, the Foreign Representative seeks entry of an order from this Court, substantially in the form of the Proposed Order attached hereto as Exhibit A, directing the joint administration of the Debtors' Chapter 15 cases for procedural purposes only, pursuant to Bankruptcy Code section 1015(b).

4. The Foreign Representative requests that this Court establish the following official caption to be used by all parties in all pleadings in the Debtors' jointly administered Chapter 15 cases:

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S. DE R.L.  
DE C.V., *et al.*

Debtors in Foreign Proceedings.

**Chapter 15 Case**

**Case No. 18-11094**

**Jointly Administered**

5. The Foreign Representative also seeks the Court's direction that a notation substantially similar to the following notation be entered on the docket in each of the Chapter 15 cases to reflect the joint administration of these cases.

An Order has been entered in this case directing the procedural consolidation and joint administration of the Chapter 15 cases of Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V. and Perforadora Oro Negro, S. de R.L. de C.V.; the docket in Case

No. 18-11094 should be consulted for all matters affecting these cases.

**JOINT ADMINISTRATION IS WARRANTED**

6. Section 1519 of the Bankruptcy Code permits this Court upon the filing of a petition under Chapter 15 to grant relief, including appropriate relief under section 1521(a)(7) of the Bankruptcy Code, where “needed to protect the assets of the debtor or the interests of creditors.” 11 U.S.C. § 1519. Section 1521(a)(7) of the Bankruptcy Code permits this Court, upon request of a foreign representative, to grant any “additional relief that may be available to a trustee,” which includes joint administration. 11 U.S.C. § 1521.

7. Bankruptcy Rule 1015(b) provides that if two or more petitions for relief are pending in the same court by or against a debtor and its affiliate, the court may order joint administration of the cases. Integradora Oro Negro and Perforadora Oro Negro are “affiliates” as that term is defined under section 101(2) of the Bankruptcy Code, as Integradora Oro Negro owns 99.99% of the equity of Perforadora Oro Negro.

8. Entry of an order for joint administration of these Chapter 15 cases will avoid duplicative notices, applications and orders, thereby saving Oro Negro considerable time and expense. The rights of the Debtors’ respective creditors, stakeholders and any other parties in interest will not be adversely affected by joint administration of these Chapter 15 cases because the relief requested in this Motion is purely administrative and in no way affects any party’s substantive rights. Indeed, joint administration will ensure that all creditors may look to one bankruptcy case docket to file their motions or otherwise seek redress against the Debtors. Moreover, the Court will also be relieved of the burden of entering duplicative orders and maintaining duplicative files.

**NOTICE**

9. In light of the administrative nature of the relief requested, the Foreign Representative submits, and requests that this Court hold, that no further or additional notice of this Motion is required to any parties. In accordance with Rule 2002 of the Federal Rules of Bankruptcy Procedure, the Foreign Representative will serve a copy of the signed Order approving this Motion on the Office of the United States Trustee; and (ii) all known parties in interest located in the United States. Accordingly, the Foreign Representative requests that the Court grant this Motion without requiring further and additional notice.

10. No prior request for the order sought herein has been made to this or any other Court.

WHEREFORE, the Foreign Representative respectfully requests that this Court enter an Order, substantially in the form attached hereto as Exhibit A, authorizing and directing the joint administration of the Debtors' Chapter 15 cases, and granting such other and further relief as is just and proper.

Dated: April 20, 2018  
New York, New York

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